

ORIGINAL



0000061034

BEFORE THE ARIZONA POWER PLANT

AND TRANSMISSION LINE SITING COMMITTEE

IN THE MATTER OF THE APPLICATION  
OF SOUTHERN CALIFORNIA EDISON  
COMPANY AND ITS ASSIGNEES IN  
CONFORMANCE WITH THE  
REQUIREMENTS OF ARIZONA REVISED  
STATUTES SECTIONS 40-360.03 AND  
40-360.06 FOR A CERTIFICATE OF  
ENVIRONMENTAL COMPATIBILITY  
AUTHORIZING CONSTRUCTION OF A  
500 kV ALTERNATING CURRENT  
TRANSMISSION LINE AND RELATED  
FACILITIES IN MARICOPA AND LA PAZ  
COUNTIES IN ARIZONA ORIGINATING  
AT THE HARQUAHALA GENERATING  
STATION SWITCHYARD IN WESTERN  
MARICOPA COUNTY AND  
TERMINATING AT THE DEVERS  
SUBSTATION IN RIVERSIDE COUNTY,  
CALIFORNIA.

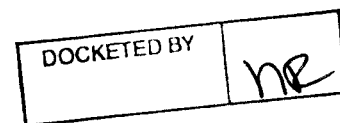
CASE NO. 130

DOCKET NO. L-00000A-06-0295-00130

STAFF'S NOTICE OF FILING OF  
ACCEPTANCE OF SERVICE OF  
SUBPOENAS

Arizona Corporation Commission  
**DOCKETED**

SEP -1 2006



Commission Staff hereby submits this Notice of Filing of Acceptance of Service of Subpoenas. Acceptance of Service of Subpoenas have been received on behalf of Mr. Robert Kondziolka and Mr. Robert Smith. Attached to each Acceptance of Service is a copy of the Subpoena on which Service was accepted.

RESPECTFULLY SUBMITTED this 1<sup>st</sup> day of September, 2006.

2006 SEP -1 1 P 4: 00  
AZ CORP COMMISSION  
DOCUMENT CONTROL

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Arizona Corporation Commission  
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Phoenix, Arizona 85007  
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1 Original and twenty-five (25)  
2 copies of the foregoing filed this  
3 1<sup>st</sup> day of September, 2006 with:  
4  
5 Docket Control  
6 Arizona Corporation Commission  
7 1200 West Washington Street  
8 Phoenix, Arizona 85007  
9  
10 Copies of the foregoing  
11 mailed this 1<sup>st</sup> day of  
12 September, 2006 to:  
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*Roseann Osorio*

1 **BEFORE THE ARIZONA POWER PLANT AND**  
2 **TRANSMISSION LINE SITING COMMITTEE**

3  
4 IN THE MATTER OF THE APPLICATION OF  
5 SOUTHERN CALIFORNIA EDISON COMPANY  
6 AND ITS ASSIGNEES IN CONFORMANCE  
7 WITH THE REQUIREMENTS OF ARIZONA  
8 REVISED STATUTES SECTION 40-360.03 AND  
9 40-360-06 FOR A CERTIFICATE OF  
10 ENVIRONMENTAL COMPATIBILITY  
11 AUTHORIZING CONSTRUCTION OF A 500KV  
12 ALTERNATING CURRENT TRANSMISSION  
13 LINE AND RELATED FACILITIES IN  
14 MARICOPA AND LA PAZ COUNTIES IN  
15 ARIZONA ORIGINATING AT THE  
16 HARQUAHALA GENERATING STATION  
17 SWITCHYARD IN WESTERN MARICOPA  
18 COUNTY AND TERMINATING AT THE  
19 DEVERS SUBSTATION IN RIVERSIDE  
20 COUNTY, CALIFORNIA

DOCKET NO. L-00000A-06-0295-00130

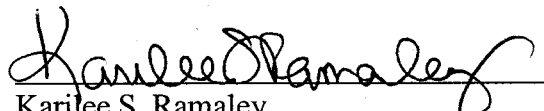
Case No. 130

**NOTICE OF ACCEPTANCE OF  
SERVICE**

21 Mr. Robert Smith, by and through undersigned counsel, hereby acknowledges voluntarily  
22 acceptance of the Subpoena and Subpoena Duces Tecum, in the above-captioned matter,  
23 commanding Mr. Smith's appearance at a hearing before the Arizona Power Plant and Transmission  
24 Line Siting Committee, currently scheduled for resumption September 11 and 12, 2006 pursuant to  
25 A.R.S. § 40-244 and A.C.C. § R14-3-210 and further hereby waives formal service of process.

26  
27 RESPECTFULLY SUBMITTED this 1<sup>st</sup> day of September, 2006.

28  
PINNACLE WEST CAPITAL CORPORATION

  
Karilee S. Ramaley  
Attorney for Arizona Public Service Company

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**BEFORE THE ARIZONA POWER PLANT AND  
TRANSMISSION LINE SITING COMMITTEE**

IN THE MATTER OF THE APPLICATION,  
OF SOUTHERN CALIFORNIA EDISON  
COMPANY AND ITS ASSIGNEES IN  
CONFORMANCE WITH THE  
REQUIREMENTS OF ARIZONA REVISED  
STATUTES SECTIONS 40-360.03 AND  
40-360.06 FOR A CERTIFICATE OF  
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AT THE HARQUAHALA GENERATING  
STATION SWITCHYARD IN WESTERN  
MARICOPA COUNTY AND  
TERMINATING AT THE DEVERS  
SUBSTATION IN RIVERSIDE COUNTY,  
CALIFORNIA

) DOCKET No. L-00000A-06-0295-00130

) Case No. 130

) **SUBPOENA AND SUBPOENA  
DUCES TECUM**

15 TO: Mr. Robert Smith

16  
17 Pursuant to Arizona Revised Statutes (A.R.S.) § 40-244, and Arizona  
18 Administrative Code (A.A.C.) R14-3-210, you are hereby commanded to appear and give your  
19 testimony at the time and place specified below:

BEFORE WHOM APPEARANCE TO BE MADE: Arizona Power Plant and Transmission  
Line Siting Committee

20 DATE AND TIME OF APPEARANCE: The hearings are currently scheduled for resumption  
21 September 11 and 12, 2006. Additional hearing  
22 days are expected. The date and time of your  
appearance is to be determined at a later date and  
you will be notified upon that determination.

23 PLACE OF APPEARANCE: The current place of hearings is The Embassy  
24 Suites, 1515 North 44<sup>th</sup> Street, Phoenix Airport (@  
25 McDowell Road) Phoenix, Arizona 85008. You  
26 will be notified of the place of appearance upon  
determination by the Committee.

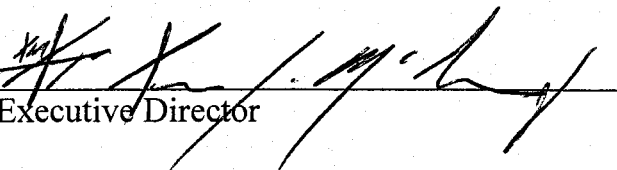
1 YOU ARE COMMANDED to appear, provide testimony and presentation material concerning  
the above-captioned matter:

2 As provided in Exhibit A, attached hereto.

3 YOU HAVE BEEN SUBPOENAED BY: The Arizona Power Plant and Transmission  
4 Line Siting Committee

5 Disobedience of this subpoena constitutes contempt of the Arizona Corporation  
6 Commission and is so punishable, pursuant to A.R.S. § 40-424.

7 Given under the hand and seal of the Arizona Corporation Commission this 30th  
day of August, 2006.

8 By:   
9 Executive Director

10 302860

1 EXHIBIT A

2 This subpoena is hereby served on Mr. Robert Kondziolka of Salt River Project ("SRP")  
3 and Mr. Robert Smith of Arizona Public Service Company ("APS") for the purpose of  
4 summoning their appearance as expert witnesses during Arizona's transmission line siting  
5 hearings of the Palo Verde to Devers II 500 kV Project. You shall each appear before the  
6 Arizona Power Plant and Transmission Line Siting Committee ("Siting Committee") on the  
7 date(s) and time(s) established procedurally by the Siting Committee Chairman, Laurie A.  
Woodall, in Docket No. L-00000A-06-0295-00130. You are to be called as a Siting Committee  
witness in your respective areas of expertise: transmission planning. Your testimony will be  
given in your individual capacity and not on behalf of the applicant, Southern California Edison  
("SCE"); any intervening party, including the Arizona Corporation Commission Staff ("Staff");  
or your respective employers.

8 You are required to provide testimony in the form of a presentation addressing, at a  
9 minimum, the issues outlined in the section below entitled 'Topics of Inquiry.' Your  
10 presentation material and any associated exhibits are to be filed in accordance with the  
11 procedures set forth for the subject proceeding by Chairman Woodall. You may supplement  
your testimony with any other subject matter you feel would be helpful to the Siting Committee  
and the Commission in their consideration of the Palo Verde to Devers II 500 kV Transmission  
Project. You will be subject to cross examination by the intervening parties. You may also be  
required to answer questions posed by members of the Siting Committee or the Commission.

12 FOUNDATION AS INDUSTRY EXPERT WITNESS

13 Mr. Kondziolka and Mr. Robert Smith have each assumed key leadership roles as the  
14 electric industry has engaged in sub-regional and regional transmission studies of the Western  
15 Interconnection. Mr. Kondziolka is Chairman of the Western Congestion Assessment Task  
16 Force ("WCATF") and the Southwest Area Transmission ("SWAT") sub-regional planning  
forum. He also is vice-chair of the Western Electricity Coordinating Council ("WECC")  
Planning and Coordination Committee ("PCC"). Mr. Smith is co-chairman of the Southwest  
Transmission Expansion Plan ("STEP") sub-regional planning forum.

17 Both Mr. Kondziolka and Mr. Smith have been participants in the Seam Steering Group –  
18 Western Interconnection ("SSG-WI") Planning Working Group that has performed economic  
19 transmission expansion planning studies for the West and the Western Governor's Association  
20 ("WGA"). They are also both members of the Transmission Expansion Planning Policy  
21 ("TEPP") Committee of the WECC Board of Trustees. They have also managed and  
22 coordinated industry studies required to comply with Arizona Statutes (A.R.S.) §40-360, *et seq.*  
23 regarding ten-year plan filings with the Arizona Corporation Commission ("Commission") and  
the Commission's related Biennial Transmission Assessment. Those studies have included  
Reliability Must Run studies of local transmission constrained areas, extreme contingency  
studies, and Palo Verde Hub risk assessments. Their participation and leadership in these  
industry forums serves as the foundation for calling upon them as industry experts regarding  
transmission planning in the Western Interconnection, Desert Southwest and Arizona.

24 BOUNDS OF TESTIMONY

25 The technical studies performed in the aforementioned industry forums have considered  
26 alternative transmission projects needed to maintain regional and national system reliability  
standards established by WECC and North American Electric Reliability Council ("NERC").

1 Reliability serves as the justification of need for such projects. The same forums have  
2 performed studies to simulate transmission congestion and investigate the effectiveness of  
3 alternative proposed projects in mitigating such congestion. Economics serves as justification of  
4 need for such transmission projects. In some instances a project is justified for both reliability  
5 and economic reasons. Once need for a project has been established and moves forward for  
6 development, the project goes through a WECC process to establish its rating. These three areas  
7 of consideration frame the bounds of expert testimony being sought of Mr. Kondziolka and Mr.  
8 Smith.

## 9 TOPICS OF INQUIRY

6 Mr. Kondziolka and Mr. Smith have first-hand knowledge of how the Palo Verde to  
7 Devers II 500 kV Project has been studied on a comparative basis with other projects in each of  
8 the following areas: reliability, economic benefit and path rating. Therefore, they are requested  
9 to prepare testimony in the form of a presentation that addresses the following topics.

- 10 1. What is transmission congestion and what is the difference between physical  
11 congestion and fiscal congestion? Define transmission congestion as presently  
12 manifested in the Western Interconnection and in particular the Arizona/California  
13 transmission interface? How is transmission congestion between Arizona and  
14 California likely to change over time? In what way(s) are retail consumers affected  
15 by transmission congestion?
- 16 2. What tools have been developed and used to model and study transmission congestion  
17 in the West? How has the electric industry used these tools to study and analyze the  
18 Western Interconnection? How well do such congestion studies correlate to  
19 congestion actually experienced historically? Can these tools be used to forecast  
20 future cost of electricity to consumers with any degree of accuracy?
- 21 3. What conclusions have been drawn from congestion studies assembled by the  
22 WCATF for the U.S. Department of Energy ("DOE") congestion assessment of the  
23 Western Interconnection? What is the status of DOE's efforts to determine the  
24 appropriateness of establishing National Electric Transmission Congestion Corridors  
25 ("NIETC") for which the Federal Energy Regulatory Commission ("FERC") will  
26 have backstop transmission siting authority? How do DOE's NIETC efforts align  
with DOE's Programmatic Environmental Impact Statement for energy corridors over  
federal lands in the West? What potential impact could either DOE process have on  
the siting of transmission lines between Arizona and California and in particular the  
Palo Verde to Devers II 500 kV Project?
4. What transmission and generation alternative solutions have been studied in the  
various study forums to resolve the congestion between Arizona and California?  
What project(s) or combination of projects has been determined to be effective in  
mitigating this congestion? How has the industry determined what economic



1 transmission expansion projects would be developed? What measures or criteria have  
2 been used in weighing the merits of alternative projects?

- 3 5. Are new transmission projects being considered in Arizona or for Arizona utilities  
4 that may impact the merits of the Palo Verde to Devers II Project? If so, please  
5 identify those projects and the ways (positive or negative) in which the Palo Verde to  
6 Devers II 500 kV Project may be impacted.
- 7 6. Are new transmission projects being considered in Arizona or for Arizona utilities  
8 that may be impacted by the scope or timing of the proposed Palo Verde to Devers II  
9 500 kV Project? If so, please elaborate.
- 10 7. Provide general information regarding the frequency of transmission outages in  
11 Arizona for high voltage and extra high voltage lines.
- 12 8. Discuss the reliability of the use of double circuit structures for EHV transmission  
13 lines and, to the extent information is provided in the SCE application, the use of the  
14 13 double circuit structures proposed by SCE through Copper Bottom Pass.
- 15 9. Provide your observations regarding slides 28 through 31 of Exhibit A-8, submitted  
16 by SCE witness, Mr. Johannes P. Pfeifenberger, as they relate to reliability.

17 302939

Kelly J. Barr, Esq.  
Salt River Project  
1521 North Project Drive  
Tempe, Arizona 85281  
Attorney representing Robert Kondziolka  
AZ Bar No. 012626

**BEFORE THE ARIZONA POWER PLANT AND  
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IN THE MATTER OF THE APPLICATION  
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CALIFORNIA

DOCKET No. L-00000A-06-0295-00130

Case No. 130

Mr. Robert Kondziolka, by and through undersigned counsel, hereby acknowledges voluntarily acceptance of the Subpoena and Subpoena Duces Tecum, in the above-captioned matter, commanding Mr. Kondziolka's appearance at a hearing before the Arizona Power Plant and Transmission Line Siting Committee, currently scheduled for resumption September 11 and 12, 2006, pursuant to A.R.S. § 40-244 and A.C.C. § R14-3-210 and further hereby waives formal service of process.

DATED this 31 day of August 2006.

By: \_\_\_\_\_

  
Kelly J. Barr  
Attorney for Robert Kondziolka

1 **BEFORE THE ARIZONA POWER PLANT AND**  
2 **TRANSMISSION LINE SITING COMMITTEE**  
3

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15 TO: Mr. Robert Kondziolka  
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6 Commission and is so punishable, pursuant to A.R.S. § 40-424.

7 Given under the hand and seal of the Arizona Corporation Commission this 30th  
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9 By: 

Executive Director

10 302860

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